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8 Attorneys for Plaintiff
Ulysses Davis, Jr.
9

10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12

13 ULYSSES DAVIS, JR.,)

14 Plaintiff,)

15 v.)

16 MARIN COUNTY JAIL, et al.,)

17 Defendants.)
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CASE NO.: 5:03-cv-04334-RMW

**JOINT STIPULATION AND
[XXXXXXXXXXXXX] ORDER TO ENLARGE
TIME FOR DISCOVERY, EXPERT
DISCLOSURES, DISPOSITIVE
MOTIONS, AND OTHER RELATED
DATES**

Pursuant to Civil Local Rule 6-2, Plaintiff Ulysses Davis, Jr. ("Mr. Davis" or "Plaintiff") and Defendants Marin County Jail, Marin County Sheriff's Department, Marin County Sheriff Deputy Larry Filipiak, Marin County Sheriff Sergeant Kenneth W. Frey, Marin County Sheriff Deputy Shay Haynes, Marin County Sheriff Deputy Hank McKenzie, Marin County Sheriff Sergeant Steve de la O, Marin County Sheriff Deputy Mike O'Neill, Marin County Sheriff Sergeant Patricia Seyler-Campbell (collectively "Defendants"), hereby stipulate and jointly request that the Court enlarge the time for discovery, expert disclosures, dispositive motions, and other related dates. The parties jointly declare the following in support of this request:

WHEREAS, on May 13, 2010, this Court entered an Order resetting the trial date to October 25, 2010;

WHEREAS, on May 13, 2010, this Court entered an Order setting a hearing on Plaintiff's motion to compel on June 15, 2010 – two weeks before the current discovery cut-off and two weeks after full expert reports are currently due;

WHEREAS, the parties have resumed their settlement negotiations in a good faith effort to resolve the action and anticipate the settlement negotiations to continue through the next few weeks and at least into June 2010; and;

WHEREAS, the parties have met and conferred and agreed, subject to the Court's approval, that it would be in the best interests of the parties to continue to discuss possible resolution prior to devoting substantial resources to continue pre-trial discovery, including the preparation of expert witness reports;

THEREFORE, pursuant to Local Rule 6-2, the parties, Mr. Davis, and Defendants, hereto and through their respective attorneys of record joint stipulate as follows:

1. The last date for designation of expert witnesses that may testify at trial and disclosure of full expert reports shall be June 30, 2010.

2. The expert and non-expert discovery cut-off date shall be July 30, 2010.

3. The last day for parties to move to compel expert and non-expert discovery shall be August 6, 2010.

4. The hearing on dispositive motions shall be on September 10, 2010.

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- 5. Dispositive motions shall be filed no later than August 6, 2010.
- 6. Oppositions to dispositive motions shall be filed no later than August 20, 2010.
- 7. Reply briefs in support of dispositive motions shall be filed no later than August 27, 2010.

Dated: May 18, 2010

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Lee-Anne Mulholland
Lee-Anne Mulholland
lmulholland@wsgr.com

Dated: May 18, 2010

COUNTY COUNSEL OF MARIN COUNTY

By: /s/ Renee Giacomini Brewer
Renee Giacomini Brewer
rbrewer@co.marin.ca.us

Attorneys for Defendants
Marin County Jail, Marin County Sheriff's
Department, Marin County Sheriff Deputy
Larry Filipiak, Marin County Sheriff Sergeant
Kenneth W. Frey, Marin County Sheriff
Deputy Shay Haynes, Marin County Sheriff
Deputy Hank McKenzie, Marin County Sheriff
Sergeant Steve de la O, Marin County Sheriff
Deputy Mike O'Neill, Marin County Sheriff
Sergeant Patricia Seyler-Campbell

1 |XXXXXXXXXXXXX **ORDER**

2 |PURSUANT TO STIPULATION, IT IS SO ORDERED.

3 |
4 |Dated: 5/20/10



5 |THE HONORABLE RONALD M. WHYTE
6 |United States District Judge

ECF CERTIFICATION

I, Lee-Anne Mulholland, am the ECF User whose identification and password are being used to file this STIPULATION AND [PROPOSED] ORDER TO ENLARGE TIME FOR DISCOVERY, EXPERT DISCLOSURES, DISPOSITIVE MOTIONS, AND OTHER RELATED DATES. In compliance with General Order 45.X.B, I hereby attest that Renee Giacomini Brewer has concurred in this filing.

Dated: May 18, 2010

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Lee-Anne Mulholland
LEE-ANNE MULHOLLAND